

**In the United States District Court for the District of Oregon**

:

Kursten Owen (individually and  
d/b/a Elegance & Geekery LLC),

:

Plaintiff,

**Plaintiff's Emergency Motion for  
Contempt**

v.

:

**Case No.: 6:25-cv-01272-AA**

Breana Askew (individually and  
d/b/a Breromi), Kiandria Demone

Boyce,

and Does 1-100,

:

Defendants.

:

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**Plaintiff's Emergency Motion for Contempt**

Plaintiff respectfully asks this Court, pursuant to Federal Rule of Civil Procedure 65 and the Court's inherent authority, for an order holding Kiandria Demone Boyce in contempt for violation of the Court's Temporary Restraining Order ("TRO") dated July 24, 2025.

**In the United States District Court for the District of Oregon**

	:	
Kursten Owen (individually and	:	
d/b/a Elegance & Geekery LLC),	:	
Plaintiff,	:	<b>Plaintiff's Memo in Support of</b>
	:	<b>Emergency Motion for Contempt</b>
v.	:	
	:	<b>Case No.: <u>6:25-cv-01272-AA</u></b>
Breana Askew (individually and	:	
d/b/a Breromi), Kiandria Demone	:	
Boyce,	:	
and Does 1-100,	:	
Defendants.	:	

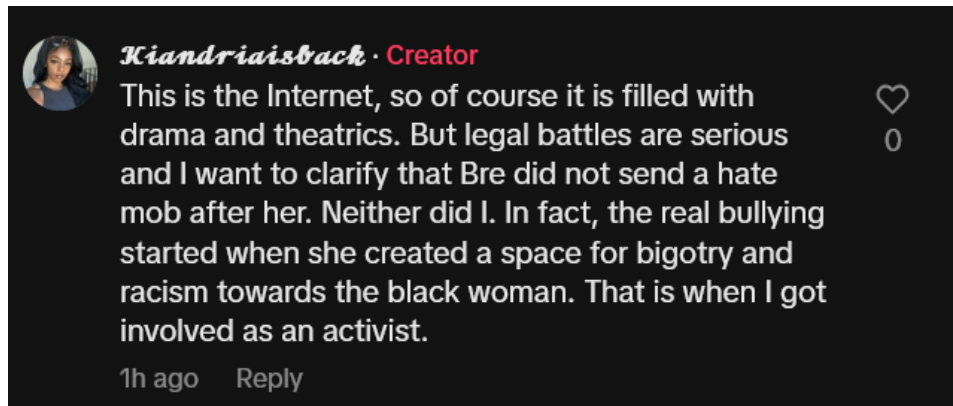
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**Plaintiff's Memo in Support of Emergency Motion for Contempt**

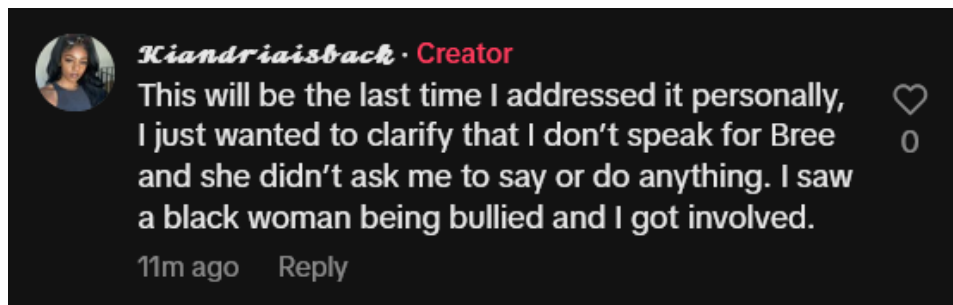
Plaintiff, Kursten Owen, hereby moves the Court for an order holding Kiandria Demone Boyce in contempt for violation of the Court's Temporary Restraining Order ("TRO") dated July 24, 2025. In support, Plaintiff states as follows:

1. On July 24, 2025, this Court entered a TRO enjoining Defendants from:
  - a. publicly accusing Plaintiff or her business of theft, counterfeiting, or other unlawful business practices, and

- b. engaging in harassing conduct directed at Plaintiff or encouraging third parties to do so.
2. The TRO was issued by Judge Ann Aiken on July 24, 2025 at 8:09am.
3. Defendants were served with the TRO and accompanying documents on July 24, 2025.
  - a. Boyce attempted to evade service by denying she was the person the summons was addressed to, despite even her landlord confirming the person named in the summons was the individual in residence at her apartment and allowing the process server into the property on that basis. Because of this Boyce had to be served via drop service.
4. The TRO is in effect until August 7, 2025, or further court order.
5. On July 25, 2025, at 3:49 PM Defendant Boyce publicly posted a video and made statements in the comments or description of this video to Tiktok accusing Plaintiff of the following (full transcript attached at the end):
  - a. “She got called out not just for mimicking her...it was a complete copy and paste”
  - b. “if you are the victim, why are you curating bigotry in this space”
  - c. “you curated that space for her to be harassed and bullied”
  - d. “a social reaction to your WRONGDOING”
  - e. With respect to defendant Askew “having their designs STOLEN from them”
  - f. Under this video Kiandria also commented the following:

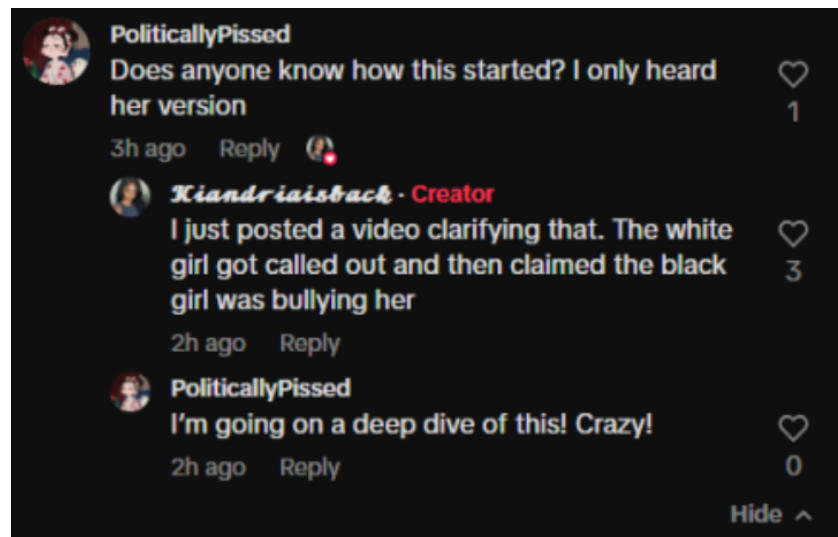


i.



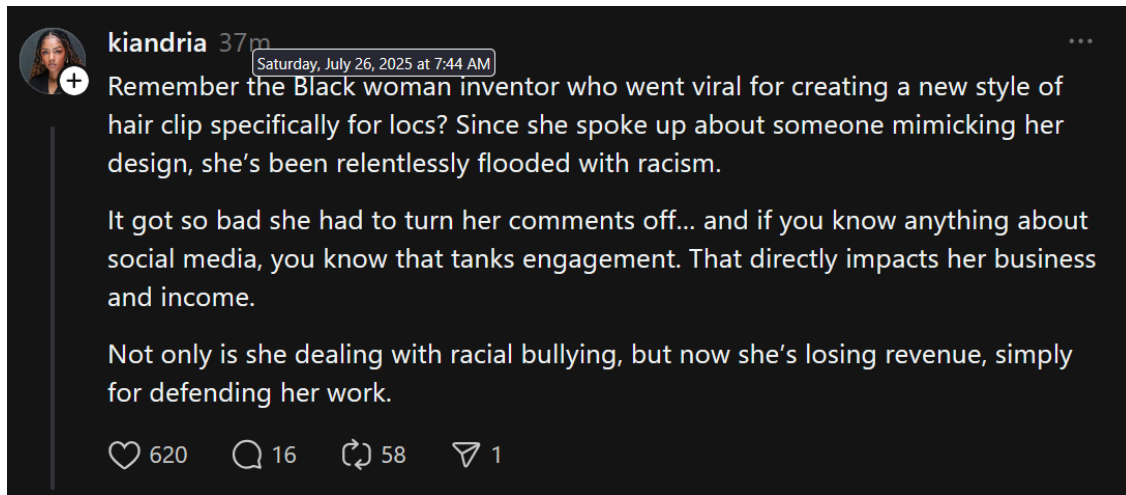
ii.

- g. Comments made on another video about plaintiff directly related it to this case:




"I just posted a video clarifying that" likely refers to the current video in question posted on July 25, 2025, at 3:49 PM.

6. On July 25, 2025, at 7:44 AM Defendant Boyce publicly posted a Threads post of the following:



Thread

4.9K views

 **kiandria** 19m

Remember the Black woman inventor who went viral for creating a new style of hair clip specifically for locs? Since she spoke up about someone mimicking her design, she's been relentlessly flooded with racism.

It got so bad she had to turn her comments off... and if you know anything about social media, you know that tanks engagement. That directly impacts her business and income.

Not only is she dealing with racial bullying, but now she's losing revenue, simply for defending her work.


341

12

29

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View activity >

 **kiandria** 19m · Author

I'm going to keep talking about her story because this is NOT OK.

42

1


 **kiandria** 19m · Author

If you can, please support this Black-owned business. Buy something, share her page, or just leave a kind word. Encouragement matters, and so does standing with her. @brebreromi 🍷👉


40

1

10

 **loribulb** 14m


Thank you for tagging her- I've been hoping to run across her name again to buy clips for my niece. I'm sorry this creator is dealing with this theft and harassment.

 **kiandria** 18m · Author

What's happening to her isn't just unfair, it's dangerous. A Black woman defended her own invention, and now she's being harassed for it. That's not a difference of opinion. That's targeted bullying.


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 **kiandria** 17m · Author


And while she's forced to turn off her comments to protect her peace, the person who benefited from her idea has a video with over a million views, where the comments are full of hate, and not one thing has been done to stop it. I personally believe they are curating a space to encourage and allow racism because they are getting sales from it.

25

 **kiandria** 17m · Author


Claiming to be the victim while letting racism run wild in your comment section isn't neutrality. It's complicity. If you truly didn't want harm done, you'd moderate your platform.

14

 **kiandria** 17m · Author

It's wild how quickly a Black woman becomes "aggressive" just for defending her own work. She didn't attack anyone, she just spoke up. And now her business is suffering because of it.


13

 **kiandria** 16m · Author

If you've ever said you support Black women, this is the moment to show it. Uplift her, promote her work, and remind her that she's not alone. Her invention was brilliant, and she deserves credit, not cruelty.


22

1

 **chandy48** 8m

I only shop BOB, I research the owners of businesses before I make my purchases.

1

 **kiandria** 11m · Author

If you haven't heard about this story, go to either my TikTok or her page to catch up! I think she removed some of her videos because she just wanted to move forward and continue promoting our business. Even when she walked away peacefully, they are still harassing her and the other creator's video is still up full of racism in the comments.

14

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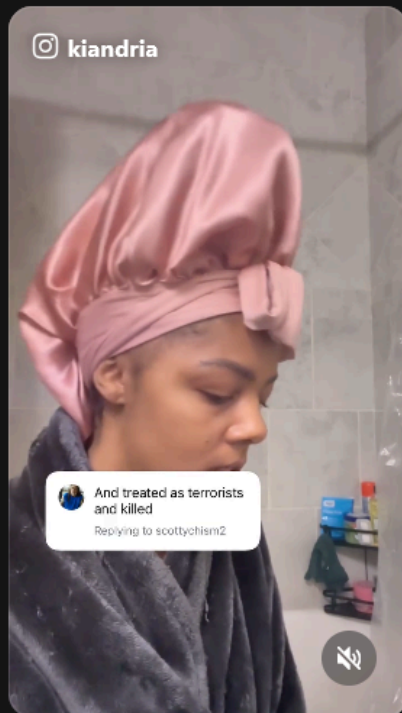
- a. A few key comments made by defendant Boyce under her post:
  - i. “Since she spoke up about **someone mimicking her design, she’s been relentlessly flooded with racism**”
  - ii. “**I am going to keep talking** about her story because this is NOT OKAY”
  - iii. “If you haven’t heard about this story, **go to either my TikTok or her page to catch up!**”
  - iv. “**That’s targeted bullying**”
  - v. “**They are still harassing her** and the other creator’s video is still up full of racism in the comments”
7. The posts further encourage and justify hostility against Plaintiff, frame her as deserving of harassment, and portray her as responsible for racist behavior—escalating the situation and directly stoking public outrage.
8. The comments encourage coordinated criticism and suggest ongoing justification of targeting the Plaintiff, which falls under “engaging in harassing conduct directed at Plaintiff...or the encouraging of third parties to do so,” prohibited by (2) of the TRO.
9. On August 1, 2025 at 12:26 PM, Defendant Boyce posted to Threads a video where she is handling and cocking a gun off camera. Although this video was not pointed directly at the plaintiff this shows the defendant is willing to make threats towards those she does not agree with. In this video, defendant Boyce is intimidating others with gun violence.

**kiandria** 1h

...

Friday, August 1, 2025 at 12:26 PM

Every time I open these apps, there is an angry white person threatening me. Consider this the first and only time I'm going to address that. I think a huge part of it is the fact that I'm a woman. Y'all think I'm just loud and vulnerable. Find you somebody safe to play with.



199 21 2

Top ▾

[View activity >](#)**kiandria** 1h · Author

...

Some of y'all are way too casual, making death threats when you don't even know people or what they are capable of. That's a horrible habit to have.

51 3 1

**kiandria** 1h · Author

...

If it's me or you... It's YOU every time.

20



## Legal Standard

The Court has authority to enforce its orders and to issue contempt sanctions under its inherent powers and Federal Rule of Civil Procedure 65. A party may be held in civil contempt for failing to comply with a clear and specific court order. Defendants' conduct is ongoing and causes Plaintiff irreparable injury to her reputation, business goodwill, emotional wellbeing and economic interests. Immediate relief is required to prevent further harm.

Plaintiff respectfully requests that the Court Issue an Order to Show Cause requiring Defendants to appear and show cause why they should not be held in

contempt for violating the TRO, to impose appropriate sanctions (including coercive fines, compensatory damages, filing and service fees, or incarceration until compliance), and to order Defendants to immediately cease all conduct in violation of the TRO and remove any offending material or communication.

### **Declaration**

I, Kursten Owen, declare under penalty of perjury pursuant to that the above is true and correct to the best of my knowledge and belief.

Dated: 8/4/2025

*Kursten Owen*

/s/ Kursten Owen


## Defendant Boyce's video 25th 3:50 pm

Tiktok Description: Replying to [@Donut Baby](#) Before she starts with the legal theatrics, let me be clear: **I didn't "send a hate mob."** I was **sarcastically repeating her words.** The real bullying happened when a **Black woman was falsely accused by HER and flooded with racist harassment. I stepped in because no one else was.**

I even saw where the Black creator took her video down. **She moved on with her business and tried to de-escalate the situation.** Meanwhile, the white creator kept her video up and allowed the harassment and bullying of that Black woman to continue. That's when I got involved. Now she's mad because she doesn't like the outcome. She was fine when Bree was isolated and being bullied alone. But when other people started speaking up, suddenly she's the victim?


Let's also talk legal. **If you're curating a space for hate and bigotry in your own comments, can you still legally claim to be a victim? The law doesn't favor people who instigate and encourage harassment.** This is not a one-sided attack. It's a back-and-forth. You can't claim you're being bullied while you

Notable comments for this video:




**Kiandriaiback · Creator**

This is the Internet, so of course it is filled with drama and theatrics. But legal battles are serious and I want to clarify that Bre did not send a hate mob after her. Neither did I. In fact, the real bullying started when she created a space for bigotry and racism towards the black woman. That is when I got involved as an activist.




0

1h ago   Reply



**Kiandriaiback · Creator**

This will be the last time I addressed it personally, I just wanted to clarify that I don't speak for Bree and she didn't ask me to say or do anything. I saw a black woman being bullied and I got involved.



0

11m ago   Reply

Full Transcript

00:00:00:00 - 00:00:20:29

Kiandria

Okay, I'm glad that you said this because it's actually a testament of what really happened. And I think it's important to clarify a timeline of events, especially before anybody starts with their legal theatrics, because **Baby Miss Thang is a professional victim**. So let me be clear. **I didn't actually send a hate mob**. Nobody sent a hate mob. And that was my point if you watch the whole video.

00:00:20:29 - 00:00:43:27

Kiandria

So I was sarcastically throwing her words back at her and calling her out for playing the victim because the **real bullying started when she played the victim and falsely accused this black girl of bullying her when she responded to Bre's video**. So we all know Bre had made those clips over a year ago, right? And then when this creator surfaced, she got called out for mimicking her.

00:00:43:27 - 00:01:07:28

Kiandria

Not just the design that's important too. **She mimicked her down to the language that she used in her video, the entire marketing style. It was a complete copy and paste, right?** In my opinion. Anyway, so Bre called her out not just for the design, but for mimicking her, and Bre went on to talk about how she was tired of black inventors having their designs stolen from them, rightfully so, given this country's history, right?

00:01:08:01 - 00:01:27:15

Kiandria

And that creator responded and immediately painted Bre as the mean girl Bre hadn't sent any, Bre handled it nicer than I would have, honestly. **But she hadn't sent any hate mob** and that's what pissed me off. That's why I got involved. **This girl just spoke up about her invention and you played the victim and they started harassing her**.

00:01:27:15 - 00:01:46:15

Kiandria

**So this white girl was curating a space for this other person, this black creator, to be harassed**. Now, me, I don't know, Bre. I don't know this girl from a

can of paint. I've said a dozen times, I'm a black activist. **So ask yourself how bad it had to be for me, an NAACP affiliated black activist, to get involved.**

00:01:46:18 - 00:02:10:13

Kiandria

They were doing that black girl wrong, and I saw the whole thing play out. I saw a black woman being harmed. And that's why I spoke up about it. And as somebody who has extensive experience in social media, I can tell you one thing. **That girl, the white creator, had a comment filter on and you can always tell because the comments posted won't match the number of comments that TikTok says.**

00:02:10:13 - 00:02:37:00

Kiandria

**So she was manually approving these comments, and I'm looking in.** There are so many microaggressions. There's blatant racism, hate and disrespect towards black women. So if you are the victim, why are you curating bigotry in this space? If you are the victim, why didn't you cut the comments off? Why didn't you delete your own video? And what's crazy is at the time, I saw that **Bre had either hidden or taken her video down, so she made an effort to escalate and walk away, and she was still being bullied and antagonized.**

00:02:37:02 - 00:02:56:27

Kiandria

And then when I went and looked at Bre's page, it was worse over there. The same people who were in this creator's comments went to Bre's page and started harassing her. **So you curated that space for her to be harassed and bullied.** And now when somebody spoke up in her defense suddenly, oh my God, oh my God, it's an attack.

00:02:57:01 - 00:03:16:26

Kiandria

No, you are being held accountable for what you did. And a lot of y'all don't like that. But this is your friendly reminder. **A social reaction to your wrongdoing does not constitute bullying, and it does not constitute harassment, not morally or in the eyes of the law.** Another thing to ask yourself is why are the black women being singled out?

00:03:16:27 - 00:03:41:06

Kiandria

**I counted at least a dozen creators that stitched this video, most of them white. So why are you pushing Bre? And why are you involving me in your legal emails? Why are you pushing her to say something under my videos specifically? Are you holding everybody else accountable? Are you suing or threatening to sue every single creator, including the white ones?**

00:03:41:06 - 00:03:54:17

Kiandria

**Because if the answer is no, then we know that this shit is not about no hair clip. And it's not about your business reputation. It's about the fact that you don't like receiving pushback for being called out for some bullshit that you did.**